

Judge Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANGEL RODRIGUEZ,

Case No. 2: 11-CV-00590 RSM

Plaintiff,

**DECLARATION OF ROBERT E.
SABIDO IN SUPPORT OF
DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
FIRST APPEARANCE**

v.

PORTRFOLIO RECOVERY ASSOCIATES, LLC.

NOTE FOR MOTION CALENDAR: 7/6/11

I, Robert E. Sabido, hereby declare:

1. I am one of the attorneys representing defendant Portfolio Recovery

17 Associates, LLC (“PRA”) in this case.

18 2. I was just retained to represent PRA. I have not had an opportunity to
19 review the file, and to consider an appropriate first appearance.

20 3. An extension of the appearance deadline will also allow the parties to
21 explore, if warranted, an early resolution of the case.

22 4. In an e-mail exchange with PRA, plaintiff's national counsel (Adam Hill)
23 states that he does not object to this request for an extension of time.

24 5. Accordingly, PRA requests that the court extend the deadline to file its first
25 appearance up to and including August 5, 2011.

26 6. This motion is made in good faith and not for any improper purpose.

1 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
2 TRUE AND CORRECT.

3 DATED: July 6, 2011

5 /s/ Robert E. Sabido

6 Robert E. Sabido

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1 **CERTIFICATE OF SERVICE**
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3 I hereby certify that on July 6, 2011, I electronically filed the foregoing
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5 **DECLARATION OF ROBERT E. SABIDO IN SUPPORT OF DEFENDANT'S**
6 **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FIRST APPEARANCE**
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8 with the Clerk of the Court using the CM/ECF System which will send notification of
9 such filing to the following:
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11 Sharon Cousineau
12 Cousineau Law Group, LLC
13 700 West Evergreen Boulevard
14 Vancouver, WA 98660
15 Of Attorneys for Plaintiff
16

17 DATED: July 6, 2011
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19 _____
20 /s/ Robert E. Sabido
21 Robert E. Sabido
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